

December 1, 2014

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RECEIVED

DEC 05 2014

WA State Department  
of Ecology (SWRO)

Dear Mr. Rocket,

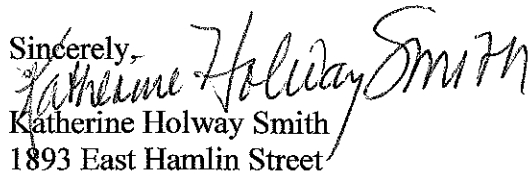
Thank you for the opportunity to provide comment on this critical issue in regard to the shellfish farming community. I am writing to request that you expedite issuance of permitting necessary to support of the Willapa-Grays Harbor Oyster Growers need to control Burrowing Shrimp with imidacloprid. My family has been in the shellfish industry in Willapa Bay since 1935. This industry is an essential piece of our economy, history, culture. Shellfish farmers also need tools to assure they can protect their lands and crops from pests and predators. It has been proven time and again that without an effective control tool, burrowing shrimp will destroy the beds growers rely on to farm. Without an effective tool, we will lose this valuable marine farming community for all practical purposes.

Beyond the needs of shellfish farmers, the control of these shrimp acts to benefit other critical species. Over the past 50 years, a data set has been developed that clearly demonstrates that controlling shrimp protects habitat that supports many other species beyond shellfish. In fact, it has been proven that shellfish beds themselves provide habitat at an equal or greater value than some of the best natural habitat including native Eel grass beds. Burrowing shrimp eliminate almost all other species as they eliminate essential habitat those other species, some of them commercial, rely upon. The actions of shellfish farmers to put significant resources toward protecting habitat should be considered an ecological public service. This fact should be noted in the permitting documents, and consideration made in regard to limiting extra requirements to conduct monitoring. Shellfish growers have expended millions of dollars to support their IPM program, with a significant result being to protect public resources. At the very least, the state should consider this contribution and provide financial support for the monitoring it is requiring as part of this permit. This will allow growers to focus their resources on developing the new control tool (imidacloprid) into a viable replacement for carbaryl.

I understand that one of the conditions proposed in the draft permit is to prohibit shrimp control in the South Willapa Bay area. This is not acceptable and needs to be addressed. As proposed, this would eliminate over 6,000 acres of commercial shellfish beds. Many of these beds have a long history or requiring shrimp control, so by prohibiting control in this area you are essentially eliminating many of the beds in south Willapa Bay. This will cripple many farms and clearly result in the eventual loss of more small family farms. My understanding is that data used to propose this closure is weak at best and that there is more relevant information available that clearly suggests that there is no reason to restrict control in the South Willapa. I oppose any restriction on shrimp control in the South Willapa, and request that the entirety of Willapa and Grays Harbor be open for shrimp treatment under this permitting.

Again, please expedite the issuance of this permit and thank you for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink that reads "Katherine Holway Smith". The signature is written in a cursive, flowing style. The first name "Katherine" is written in a smaller, more compact script, while "Holway Smith" is written in a larger, more expansive script. The signature is positioned above the printed name and address.

Katherine Holway Smith

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